

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND)	
IRBESARTAN PRODUCTS LIABILITY)	MDL No. 19-2875 (RBK/KMW)
LITIGATION)	
)	
This document relates to:)	AMENDED NOTICE OF
<i>Fernando Feijoo, as representative of the</i>)	DEPOSITION
<i>Estate of Eleonora Deutenberg v. Aurobindo</i>)	
<i>Pharma USA, Inc., et. al.</i>	

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF FERNANDO FEIJOO,
REPRESENTATIVE OF THE ESTATE OF ELEONORA
DEUTENBERG**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, filed November 17, 2020 – Document 632), Defendants Aurobindo Pharma Ltd., Aurobindo Pharma USA, Inc., and Aurolife Pharma LLC will take the deposition upon oral examination of FERNANDO FEIJOO, as the Representative of the Estate of Eleonora Deutenberg, on February 23, 2022 at 11:00 a.m., EDT, and continuing until completion. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The attorney contact for the deposition is:

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Dated: February 18, 2022

Respectfully submitted,

/s/ John P. Lavelle, Jr.
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*Counsel for Defendants Aurobindo Pharma Ltd.;
Aurobindo Pharma USA, Inc.; and Aurolife Pharma LLC*

CERTIFICATE OF SERVICE

I, John P. Lavelle, Jr., do hereby certify that on February 18, 2022, I caused a true and correct copy of the foregoing **AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF FERNANDO FEIJOO, REPRESENTATIVE OF THE ESTATE OF ELEONORA DEUTENBERG** to be served on all counsel of record via CM/ECF.

I further certify that a copy of the foregoing was served on Plaintiff's counsel by e-mail, with a copy served on all parties via MDL Centrality, on February 18, 2022.

Dated: February 18, 2022

/s/ John P. Lavelle, Jr.

John P. Lavelle, Jr.